

UNITED STATES FEDERAL COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL DOCKET NO: 16-CV-10105

ANDRE BISASOR)

PLAINTIFF,)

V.)

DANSLAV SLAVENSKOJ, ET AL,)
DEFENDANTS)
_____)

**MOTION FOR LEAVE OF COURT TO FILE A REPLY TO DEFENDANT KEN
VEDAA'S OPPOSITION [ECF #32] TO PLAINTIFF'S MOTION FOR STAY PENDING
APPEAL [ECF #23 & 24]**

I respectfully request leave of court to file a reply to Defendant Ken Vedaa's Opposition [ECF#32] to my Motion for Stay Pending Appeal [ECF#23&24]. In support of this motion, I state the following:

1. On June 6, 2016, Defendant Ken Vedaa filed an opposition [ECF#32] to my motion for stay pending appeal [ECF#23&24].
2. In his opposition, Mr. Vedaa states for the first time items unrelated to the arguments I made in my motion. Instead he goes off on issues raised for the first time including issues related to service of copies of documents, issues related to why I filed bankruptcy, issues related to my landlord-tenant dispute, and issues related to conduct/occurrences in the state court and federal court, etc. His pleading reads like a scatter-shot of memes in a stream of consciousness rant. Nevertheless, he puts forth accusations, innuendo and untruths that if left unchallenged could serve to prejudice this court in their overall response to my motion.


3. These are new arguments never raised before anywhere in this court. Because Defendant Vedaa has created these new arguments and assertions, that were not raised before, I therefore have reasonable grounds to address those issues and those arguments in the attached reply.
4. I believe that the standard for granting a leave to file a reply is whether the party making the reply would be unable to contest matters that were presented to the court for the first time by opposing counsel in their opposition. *Lewis v. Rumsfeld*, 154 F. Supp. 2d 56, 61 (D.D.C. 2001).
5. Further, because I did not have a chance to address these new arguments in my previously filed motion for stay pending appeal [ECF #23-24], and if this court denies my stay pending appeal and remand the case to state court, then I will not have another forum in which to address them if I cannot file the attached reply.
6. Insofar as my appeal is pending, it is essential for me, as the Plaintiff, to reply to the Defendants' arguments to that end.
7. Moreover, much of Defendant Vedaa's opposition is deceptive and is designed to mislead the court. He engages in superfluous and gratuitous attacks that do not serve to address the issues but instead deflect from the facts. His complaints are vexatious, petty and irrelevant and intended to scandalize, annoy, harass and increase costs of litigation. He also referenced a skewed procedural history (for state court), and has also mischaracterized the facts as well as my arguments before this court.
8. Ken Vedaa wants this court to ignore substance and focus on would-be peripheral technicalities. Yet, these would be technicalities are fabricated, based on lies or non-existent, which adds insult to injury. This is a very important point because it goes to the

heart of honesty and integrity of Mr. Vedaa and his representations made to this court, and if he is allowed to (without challenge) blatantly and unabashedly engage in outright lying to this court in order to seek some legal or tactical advantage, then it would make a mockery of these proceedings and assault the very foundations of the justice system. This is a serious charge but one I intend to demonstrate conclusively in my reply. It is even further compounded by the fact that Mr. Ken Vedaa is a second or third year law student at William Mitchell College of Law, who presumably will soon be applying for admission to the bar. Soon-to-be lawyers are not to be rewarded with such deceptive conduct as it would set the tone for their entire career. Arguably, he should not be even admitted to the bar based on such conduct.

9. Therefore, a proper reply is required to ensure that this Court has adequate information to address these issues, inclusive of the new arguments raised in Defendant Vedaa's opposition.
10. Hence, I hereby ask permission to file the attached reply for which leave is hereby requested.

WHEREFORE, I hereby humbly request this Honorable Court grant my request and/or other relief that the Court deems just and proper.

Respectfully submitted,


Plaintiff Andre Bisasor
119 Drum Hill Rd, #233
Chelmsford MA 01824
781-492-5675

Dated: June 16, 2016

CERTIFICATE OF SERVICE

I hereby certify that on this date, upon information and belief, the Court's ECF system will serve an electronic copy of the foregoing upon the following counsel of record:

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I further certify that on this date, I caused a copy of the foregoing to be served upon each of the following non-ECF registered parties:

Ken Vedaa, pro se

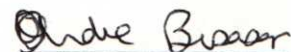
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